

REDACTED

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Criminal Action No. 08-85
)	
STACEY BAISDEN,)	
)	
Defendant.)	

INDICTMENT

The Grand Jury for the District of Delaware charges that:

COUNTS ONE TO FORTY-SIX

Introduction

1. At all times relevant to this Indictment, the defendant, Stacey Baisden, was employed by American Life Insurance Company ("ALICO") in Wilmington, Delaware. The defendant was a supervisor in the Cash Control Unit ("CCU") at ALICO, a unit responsible for processing bill payments for the company's vendors.

Scheme and Artifice to Defraud

2. Starting in or about 2002, the defendant, Stacey Baisden, did devise and intend to devise a scheme and artifice to defraud ALICO and to obtain money and property by means of false and fraudulent pretenses and representations.

3. As part of this scheme and artifice to defraud, between on or about April 2002 and on or about March 2006, the defendant fraudulently used ALICO's Web Access Voucher Entry System ("WAVES") to pay off the personal expenses of herself and her acquaintances.

4. It was further part of the scheme that, in nearly all instances, the defendant utilized the user

identification ("user ID") of another ALICO employee, C.Q., to prepare vouchers on the WAVES system that would be used to pay these personal expenses. The defendant falsely labeled the vouchers to make them appear as if they were meant to pay for routine corporate expenses. In order to further hide her fraudulent conduct, the defendant knowingly charged these vouchers to departments at the company that had significant expenditures each month, so that the large amount of fraudulent charges would be less noticable to others who might review the overall expenditures of those departments.

5. It was further part of the scheme that, after the defendant created these vouchers, she fraudulently manipulated the WAVES system to make it appear that other ALICO employees had approved these expenditures, when in fact they had not. In addition, in order to hide her conduct from the company, the defendant did not scan into the WAVES system any documentation regarding these transactions, in contravention of company policy.

6. It was further a part of the scheme that the defendant then caused company checks to be printed in the company's Wilmington office, in the amounts listed on the vouchers. The defendant then caused these checks to be sent to her various creditors.

7. It was a further part of the scheme that, in or around April 2002 through February 2006, the defendant caused checks to be generated and mailed to pay off personal expenses charged on the defendant's corporate Diner's Club credit card accounts (numbers XXXXXXXXXXXX8400 and XXXXXXXXXXXX8418) and corporate Citibank credit card accounts (numbers XXXXXXXXXXXXXXX8525 and XXXXXXXXXXXXXXX3503).

8. It was a further part of the scheme that, in or around March 2005 through February 2006, the defendant caused checks to be generated and mailed to pay off expenses charged on an American Express credit card account (number XXXXXXXXXXXX1000) and a Citibank credit card account (number XXXXXXXXXXXX9776).

9. It was a further part of the scheme that, in or around May 2004 through January 2006, the defendant caused checks to be generated and mailed to pay off expenses on the defendant's Verizon phone account (number XXXXXXXXXXXX5801Y).

10. It was a further part of the scheme that, in or around April 2004 through March 2006, the defendant caused checks to be generated and mailed to pay off expenses charged on the Citibank credit card accounts of R.B. (account numbers XXXXXXXXXXXX6047 and XXXXXXXXXXXX4763), the American Express credit card account of J.W.B. and M.P. (account number XXXXXXXXXXXX1001) and the Verizon phone account of R.B. (number XXXXXXXXXXXX1725Y).

11. It was a further part of the scheme that, in or around March 2004 through March 2006, the defendant caused checks to be generated and mailed to pay off expenses on the Verizon phone account of T.Q. and C.Q. (number XXXXXXXXXXXX7661Y).

Charging Paragraphs

12. On or about the dates set forth below, in the District of Delaware, having devised and intending to devise the scheme and artifice to defraud described in paragraphs 2 through 11 above, incorporated herein by reference, and for obtaining money and property by means of false and fraudulent pretenses and representations, for the purpose of executing such scheme and artifice to defraud, the defendant, Stacey Baisden, did knowingly cause to be sent by mail the following checks, each in violation of Title 18, United States Code, Section 1341:

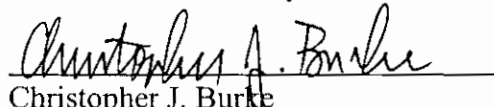
Count	Payee	Check No.	Amount	Date
One	Diner's Club	90205628	\$1,000.00	June 6, 2003
Two	Diner's Club	90205648	\$1,200.00	August 15, 2003
Three	Diner's Club	90205777	\$1,879.00	October 2, 2003
Four	Diner's Club	90205801	\$2,601.29	November 20, 2003

Five	Diner's Club	90205813	\$3,130.29	January 9, 2004
Six	Diner's Club	31567801	\$2,380.00	March 31, 2004
Seven	Diner's Club	31581206	\$1,384.76	April 30, 2004
Eight	Diner's Club	31603888	\$3,537.83	June 24, 2004
Nine	Diner's Club	31623349	\$2,920.55	August 13, 2004
Ten	Diner's Club	31638223	\$4,212.78	September 21, 2004
Eleven	Diner's Club	31650497	\$3,179.00	October 21, 2004
Twelve	Diner's Club	31656934	\$2,568.68	November 5, 2004
Thirteen	Diner's Club	31666120	\$5,359.68	November 30, 2004
Fourteen	Diner's Club	80073293	\$887.00	February 4, 2005
Fifteen	Citibank	80073321	\$1,035.89	June 3, 2005
Sixteen	Citibank	80073354	\$4,145.08	September 7, 2005
Seventeen	Citibank	80073371	\$3,459.62	November 3, 2005
Eighteen	Citibank	80073389	\$3,479.11	December 8, 2005
Nineteen	Citibank	80073401	\$11,226.58	January 9, 2006
Twenty	Citibank	00125707	\$6,114.07	February 22, 2006
Twenty-One	American Express	80073299	\$5,354.67	March 17, 2005
Twenty-Two	American Express	80073309	\$7,548.65	April 13, 2005
Twenty-Three	American Express	80073311	\$4,526.55	April 22, 2005
Twenty-Four	American Express	80073313	\$8,021.96	May 4, 2005
Twenty-Five	American Express	80073319	\$9,587.69	June 2, 2005
Twenty-Six	American Express	80073339	\$14,670.36	July 22, 2005
Twenty-Seven	American Express	80073349	\$7,548.65	August 17, 2005
Twenty-Eight	American Express	80073351	\$10,661.41	August 25, 2005
Twenty-Nine	American Express	80073355	\$14,215.42	September 7, 2005
Thirty	American Express	80073358	\$8,021.96	September 20, 2005
Thirty-One	American Express	80073359	\$14,110.25	September 29, 2005
Thirty-Two	American Express	80073372	\$5,850.12	November 4, 2005

Thirty-Three	American Express	80073377	\$14,670.36	November 14, 2005
Thirty-Four	American Express	80073387	\$5,850.12	November 29, 2005
Thirty-Five	American Express	80073390	\$7,548.65	December 9, 2005
Thirty-Six	American Express	80073399	\$7,003.06	December 21, 2005
Thirty-Seven	American Express	80073404	\$14,215.42	January 18, 2006
Thirty-Eight	American Express	80073408	\$8,021.96	January 23, 2006
Thirty-Nine	American Express	00121003	\$2,567.00	February 4, 2005
Forty	American Express	00125708	\$18,000.00	February 22, 2006
Forty-One	Citibank	80073388	\$4,574.06	December 8, 2005
Forty-Two	Citibank	80073397	\$4,862.22	December 21, 2005
Forty-Three	Citibank	80073402	\$4,628.14	January 9, 2006
Forty-Four	Citibank	80073410	\$4,856.75	January 23, 2006
Forty-Five	Citibank	00125855	\$4,635.40	March 3, 2006
Forty-Six	Citibank	00125962	\$4,770.66	March 15, 2006

COLM F. CONNOLLY
United States Attorney

BY:



Christopher J. Burke
Assistant United States Attorney

Dated: May 27, 2008